

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HARVEY H. JAY,

Plaintiff,

v.

SPECTRUM BRANDS HOLDINGS, INC.,
SPECTRUM BRANDS, INC., and SHASER,
INC.,

Defendants.

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) C.A. No. 1:13-cv-8137-LTS-DCF
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**DECLARATION OF WAYNE L. STONER IN SUPPORT OF SPECTRUM’S MOTION
FOR RECONSIDERATION OF THE COURT’S DENIAL OF LEAVE TO AMEND**

I, Wayne L. Stoner, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts. I am a Partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, which represents Spectrum Brands Holdings, Inc., Spectrum Brands Inc., and Shaser, Inc. (“Spectrum”), the Defendants in the above-titled proceedings.

2. On June 9, 2015, counsel for Spectrum took Plaintiff Harvey H. Jay’s deposition upon oral examination. True and correct copies of relevant excerpts from this deposition’s transcript are attached hereto as **Exhibit A**.

3. On June 23, 2015, Veritext Corp. emailed Spectrum’s counsel to notify Spectrum that the final transcript of Plaintiff Harvey H. Jay’s deposition was available for download. A true and correct copy of this email is attached hereto as **Exhibit B**.

4. On August 12, 2015, counsel for Spectrum took Joseph Uradnik's deposition upon oral examination. True and correct copies of relevant excerpts from this deposition's transcript are attached hereto as **Exhibit C**.

5. On October 23, 2015, counsel for Spectrum took R. Neil Sudol's deposition upon oral examination. True and correct copies of relevant excerpts from this deposition's transcript are attached hereto as **Exhibit D**.

Dated: December 9, 2015

/s/ Wayne L. Stoner

CERTIFICATE OF SERVICE

I hereby certify that on this December 9, 2015, I caused to be served a true and correct copy of the foregoing Declaration in Support of Spectrum's Motion for Reconsideration of the Court's Denial of Leave to Amend via the Court's ECF system upon all counsel of record.

A handwritten signature in black ink, appearing to read "Shira C. Hoffman", written over a horizontal line.

Shira C. Hoffman